

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 0:24-cv-60984-Rosenberg/Augustin-Birch

MELINDA MICHAELS,

Plaintiff,

v.

SEAWATER PRO LLC and MICHAEL SPANOS  
a/k/a MIKE SPANOS,

Defendants.

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**PLAINTIFF MELINDA MICHAELS' AMENDED RESPONSE TO DEFENDANTS'  
FIRST SET OF INTERROGATORIES**

1. Identify any other legal proceeding, litigation, arbitration, mediation and/or administrative proceeding (including criminal matters) in which you have ever participated, and for each identify your role (i.e., party, witness, expert, jury member) the case name, case number, court, and briefly describe the nature of the litigation and the result.

**ANSWER:**

Broward County, Florida:

DVCE23002161; Michael Spanos v. Melinda Faith Michaels

DVCE23000795; Bailey Sierra-Michelle v. Melinda Michaels

DVCE23000794; Arya-Jane Precious-Dovey Mitchell v. Melinda Michaels

**AMENDED ANSWER:**

Broward County, Florida:

DVCE23002161; Michael Spanos v. Melinda Faith Michaels; Family court – Filed March 24, 2023;

Allegations of Cyberstalking; case is still open; Michael's was ordered to have no contact with

Defendant on April 14, 2023. Defendant Spanos prosecuted a Motion for contempt of no contact, but however, withdrew his Motion on October 7, 2024.

DVCE23000795; Bailey Sierra-Michelle v. Melinda Michaels; Allegations of Cyberstalking; Case was voluntarily dismissed by Sierra-Michelle (Michaels' niece) in June of 2023.

DVCE23000794; Arya-Jane Precious-Dovey Mitchell v. Melinda Michaels; Allegations of Cyberstalking; Case was voluntarily dismissed by Precious-Dovey Mitchell (At the time, the Girlfriend of Michael's Niece Sierra-Michelle) in June of 2023.

CONO24064195; Wells Fargo v. Melinda Michaels – *Pending Status* - Filed in October, 2024; Credit Card Debt.

3. Identify and provide the name, address, telephone number, place of employment and job title of any person who has, claims to have, or whom you believe may have, knowledge or information pertaining to any fact alleged in your Complaint filed in this action, or any fact underlying the subject matter of this action, and state the specific nature, substance, and source of the knowledge that you believe the person(s) may have.

**ANSWER:**

Melinda Michaels, Plaintiff. c/o Koz Law, P.A. Has knowledge of the facts and circumstances surrounding this lawsuit including Plaintiff's claims.

Michael Spanos a/k/a Mike Spanos, Defendant. c/o Defendants' Counsel. Has knowledge of the facts and circumstances surround this lawsuit including Plaintiff's claims and Defendants' defenses.

Ernst VonSanthaagens – 954-889-4466. 37 Hendricks Isle, Ft. Lauderdale, FL 33301. Did part time work at the Defendants. Mr. VonSanthaagens witnessed Plaintiff's day-to-day work and hours for Defendants. He has knowledge that Plaintiff was not getting paid, and that Plaintiff was owed money by Defendants.

Debbie Eisenberg – 954-253-9538. 47 Hendricks Isle, Ft. Lauderdale, FL 33301. Ms. Eisenberg was the landlord for the dock that Defendants maintained a residence. She witnessed Plaintiff working for Defendants. Ms. Eisenberg has knowledge that if and when Defendants were short on rent, Plaintiff paid the rent out of her personal account. Ms. Eisenberg has knowledge that Plaintiff did not get paid, and that Plaintiff was owed money by the Defendants.

Charles (“Chuck”) Dixon – 305-972-5780. 37 Hendricks Isle, Ft. Lauderdale, FL 33301. Ms. Dixon was a neighbor and friend of Plaintiff and Defendant Spanos. Mr. Dixon attended multiple trade shows and witnessed Plaintiff working those shows as a representative of Defendants. Mr. Dixon witnessed Plaintiff working at the shop. Mr. Dixon has knowledge that Plaintiff was working and not getting paid properly, and that Plaintiff was owed money by Defendants.

Dan Kelly – 954-663-1630. Address unknown. Mr. Kelly works in the boat business, was present at the trade shows and witnessed Plaintiff working for the Defendants. Mr. Kelly has knowledge that Plaintiff was working for the Defendants and not being properly compensated for her work.

“Moji” Zahedi – 602-317-9999. Mesa, Arizona. Mr. Zahedi witnessed Plaintiff working in the shop whenever he was in town. Mr. Zahedi attended the trade shows and witnessed Plaintiff working for Defendants. Mr. Zahedi also witnessed Plaintiff showing up to meetings held for potential buyers. Mr. Zahedi has knowledge that Plaintiff was not getting paid properly, and that Plaintiff was not being paid at all. Mr. Zahedi has knowledge that Plaintiff was owed money by Defendants.

Debbie Zahedi – 480-570-4444. Mesa, Arizona. Mrs. Zahedi witnessed Plaintiff going to meetings held for potential buyers. Mrs. Zahedi has knowledge that Plaintiff was not being paid properly by Defendants, and that Plaintiff was not being paid at all. Mrs. Zahedi has knowledge that Plaintiff was owed money by the Defendants.

Natalie Michael – 954-554-2736. Naples, Florida (exact address unknown). Ms. Michael worked as a bookkeeper for Defendants. Ms. Michael witnessed Plaintiff performing day-to-day tasks for the

Defendants. Ms. Michael had knowledge that Plaintiff was not being paid properly because Ms. Michael did payroll. Ms. Michael has knowledge of the breadth of the Defendants' books, and has the knowledge that Plaintiff was owed money by Defendants.

Dylan Tubbert – 623-703-5259. Plaintiff's Son. Mr. Tubbert was employed by Defendants in charge of building and shipping and witnessed Plaintiff working for Defendants. Mr. Tubbert has knowledge that Plaintiff was not getting paid properly by Defendants, and that Plaintiff was owed money by the Defendants.

Nicholas Tubbert – 623-552-1850. Gilbert, Arizona. Plaintiff's Son. Mr. Tubbert witnessed Plaintiff working for the Defendants on a daily basis whenever he was in town throughout the claim period. Mr. Tubbert has knowledge that Plaintiff was not getting paid properly, and that Plaintiff was owed money by the Defendants.

Francis "Quinton" Tubbert V – 913-710-8740. 22244 W 121<sup>st</sup> Terrace, Olathe, Kansas, 66061. Plaintiff's Son. Mr. Tubbert witnessed Plaintiff working for the Defendants on a daily basis whenever he was in town throughout the claim period. Mr. Tubbert has knowledge that Plaintiff was not getting paid properly, and that Plaintiff was owed money by the Defendants.

Alex Loebelenz – 954-288-2828. Ft. Lauderdale (address unknown). Mr. Leobelenz performed work at Defendants' warehouse and witnessed Plaintiff working for the Defendants on a daily basis. Mr. Leobelenz has knowledge that Plaintiff was not getting paid properly, and that Plaintiff was owed money by the Defendants.

Melina Loebelenz – 954-204-8924. Ft. Lauderdale (address unknown). Mrs. Leobelenz witnessed Plaintiff coming and going on a daily basis from the Defendants. Mrs. Leobelenz has knowledge that Plaintiff was not getting paid properly, and that Plaintiff was owed money by the Defendants.

**AMENDED ANSWER:** All aforementioned, and:

Chris G. (Full last name unknown), 954-661-8030, and Paul (last name unknown)(Dent Master Pro). Are the on-site landlords for SeaWater Pro. Chris as well as Paul witnessed the hours and days Plaintiff was required to work by the Defendants.

Eric Mortensen, neighbor to Plaintiff and Defendants during the period where Defendants were operating the business out of the auto body shop. Mr. Mortenson witnessed Plaintiff working on a daily basis for Defendants.

Dillon Stokes – 954-624-6180, former employee of Defendants. Mr. Stokes witnessed Plaintiff working for Defendants.

Sharon Murray – 913-201-2884, Plaintiff's mother. Ms. Murray lives in Kansas and Lake of the Ozarks, Missouri. Ms. Murray witnessed Plaintiff working for the Defendants on a daily basis whenever she was in town throughout Plaintiff's claim period.

I declare under penalty of perjury pursuant to 28 U.S. Code § 1746 foregoing is true and correct to the best of my knowledge and belief.

*Melinda Michaels*

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MELINDA MICHAELS

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01 / 17 / 2025

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Date

**CERTIFICATE OF SERVICE**

I hereby certify that on this 17th day of January 2025, a true and correct copy of Plaintiff Melinda Michaels' Amended Response to Defendants' First Set of Interrogatories was served by email on all counsel or parties of record on the Service List below.



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